

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

**This Document Relates to All Actions**

MDL No. 2875

Honorable Robert B. Kugler,  
District Court Judge

**CERTIFICATION OF  
VICTORIA DAVIS  
LOCKARD, ESQ.**

VICTORIA DAVIS LOCKARD, ESQ., being of full age, certifies as follows:

1. I am a Shareholder at Greenberg Traurig, LLP, attorneys for Defendants Teva Pharmaceuticals USA, Inc., Teva Pharmaceutical Industries Ltd., Actavis Pharma, Inc., and Actavis LLC. I make this Certification based on personal knowledge and in support of the Defendants' Joint Motion to Exclude Opinions of John Quick.

2. Attached hereto as Exhibit A is a true and accurate copy of the Expert Declaration of John Quick, dated November 7, 2021, with Exhibits A-B, served in MDL 2875.

3. Attached hereto as Exhibit B is a true and accurate copy of the transcripts of Volume I and Volume II of the deposition of John Quick in MDL 2875, dated January 27, 2022 and January 28, 2022, with errata.

4. Attached hereto as Exhibit C is a true and accurate copy of the Expert Report of Timothy Anderson, M.S., M.B.A., date January 12, 2022 and disclosed by Defendant Teva in this litigation, pursuant to Federal Rule of Civil Procedure 26(a)(2)(B). This document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the applicable Amended Confidentiality and Protective Order [ECF No. 1661].

Dated: May 3, 2022

Respectfully submitted,

/s/ Victoria Davis Lockard  
Victoria Davis Lockard

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and Actavis LLC*

**CERTIFICATE OF SERVICE**

I, Kate Wittlake, an attorney, hereby certify that on May 3, 2022, I caused a copy of the foregoing document to be served on all counsel of record via CM/ECF.

/s/ Kate Wittlake

Kate Wittlake

Greenberg Traurig, LLP